

EXHIBIT A

**Redacted Version
of Document Sought
to be Sealed**

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

- - -
CHASOM BROWN, WILLIAM : Case No.
BYATT, JEREMY DAVIS, :
CHRISTOPHER CASTILLO : 5:20-cv-03664-
and MONIQUE TRUJILLO, : LHK
individually and :
on behalf of all other :
similarly situated, : CONFIDENTIAL
:
Plaintiffs, :
:
v. :
GOOGLE, LLC, :
:
Defendant. :
- - -

Wednesday, June 16, 2021
- - -

Videotaped 30(b)(6) deposition of
GLENN BERNTSON held pursuant to notice,
beginning at 10:27 AM, on the above date,
and recorded stenographically by
Constance S. Kent, a Certified Court
Reporter, Registered Professional
Reporter and Notary Public.

* * *

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APPEARANCES:

BOIES SCHILLER FLEXNER LLP

BY: MARK C MAO, ESQ

BEKO REBLITZ-RICHARDSON, ESQ

44 Montgomery Street, 41st Floor

San Francisco, California 94104

(415) 293-6800

mmao@bsflp.com

brichardson@bsflp.com

Attorneys for Plaintiffs

BOIES SCHILLER FLEXNER LLP

BY: ROSSANA BAEZA, ESQ

(pro hac vice)

100 SE 2nd Street, 28th Floor

Miami, Florida 33131

(305) 539-8400

rbaeza@bsflp.com

Attorney for Plaintiffs

MORGAN & MORGAN

BY: RYAN MCGEE, ESQ

201 N Franklin Street, 7th Floor

Tampa, Florida 33602

(813) 223-5505

rmcgee@forthepeople.com

Attorney for the Plaintiff

SUSMAN GODFREY L L P

BY: ALEXANDER FRAWLEY, ESQ

1900 Avenue of the Stars, Suite 1400

Los Angeles, California 90067

(310) 789-3100

afrawley@susmangodfrey.com

Attorneys for Plaintiffs

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APPEARANCES, continued

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

BY: STEPHEN BROOME, ESQUIRE

JOSEF ANSORGE, ESQUIRE

1300 I Street, NW, Suite 900

Washington, D.C. 20005

(202) 538.8000

stephenbroome@quinnemanuel.com

josefansorge@quinnemanuel.com

Counsel for Defendants

ALSO PRESENT:

Matthew Gubiotti, Esquire

In-house counsel for Google

Jay Bhatia

Chris Thompson, 233 Analytics, LLC

Adam Depew, Video Specialist

Noah Fox, Trial Technician

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<p style="text-align: right;">Page 370</p> <p>1 MR. BROOME: Are you done? 2 Are you done, Mark? 3 MR. MAO: I am not done. 4 I'm reserving my rights. 5 MR. BROOME: You're done, 6 right? I mean, do you have -- let 7 me -- let me put it this way: Do 8 you have any more questions for 9 the witness to ask right now? 10 We're not bringing him back 11 because you want to reserve time 12 hypothetically. 13 MR. MAO: We are off the 14 clock, my clock. If you want to 15 go on your clock -- 16 MR. BROOME: Yeah, I do. 17 I'm just asking are you done with 18 your questioning? It's a pretty 19 straightforward question. Are you 20 done with your questioning of this 21 witness? 22 MR. MAO: I'm reserving my 23 rights. 24 MR. BROOME: Reserving your</p>	<p style="text-align: right;">Page 371</p> <p>1 rights for what? 2 MR. MAO: I'm reserving my 3 rights to ask additional questions 4 of a witness that's properly 5 prepared to testify to the topics, 6 including the topics which the 7 court had actually ordered. 8 MR. BROOME: Okay. But you 9 don't have any more questions for 10 Mr. Berntson? 11 MR. MAO: Disagree. I don't 12 know. 13 MR. BROOME: You don't know 14 if you have any more questions for 15 him? 16 MR. MAO: Steve, stop 17 burning my time. 18 MR. BROOME: Do you have any 19 more questions for Mr. Berntson? 20 MR. MAO: I'm pausing my 21 portion. 22 MR. BROOME: Okay. I'm 23 going to take that as a no. 24 Did -- can I -- can I ask my</p>
<p style="text-align: right;">Page 372</p> <p>1 questions now? I'm going to take 2 your silence, your non-response as 3 a yes. 4 - - - 5 EXAMINATION 6 - - - 7 BY MR. BROOME: 8 Q. Mr. Berntson, do you recall 9 that Mr. Mao asked you some questions 10 today about Google mapping Biscotti IDs 11 and [REDACTED] and conversion 12 tracking? 13 A. Yes. 14 Q. And I believe you testified 15 that mapping in [REDACTED] requires a 16 Gaia ID; is that -- is that right? 17 A. That is correct. 18 Q. For the dataflow that's at 19 issue in this case where users are on 20 their browsers, they're signed out of 21 their Google accounts, they're in private 22 browsing mode, would there be any mapping 23 from Gaia to Biscotti? 24 A. No, because when you go into</p>	<p style="text-align: right;">Page 373</p> <p>1 private browsing mode, you start off with 2 a completely empty cookie jar. A 3 Biscotti is created, and if you don't 4 sign in to Google, there's no Gaia to map 5 that new Biscotti to. The Biscotti that 6 is present on the non-incognito browser 7 instance is not shared with the incognito 8 browser instance so there's no way of 9 creating that mapping from an incognito 10 session. 11 Q. Okay. And -- and conversely 12 would there be any mapping from Biscotti 13 to Gaia under those same conditions? 14 A. No. Again for similar 15 reasons, there is no Gaia to map that 16 Biscotti to. 17 Q. Mr. Mao asked -- also asked 18 you a number of questions about the 19 X-Client-Data header. 20 Do you recall that? 21 A. Yes. 22 Q. Do you understand that the 23 plaintiffs in this case have proposed 24 that Google could use the absence of the</p>

<p style="text-align: right;">Page 374</p> <p>1 X-Client-Data header to identify users 2 who are in incognito mode? 3 A. Yes. 4 Q. And does Google use the 5 absence of the X-Client-Data header to 6 identify users who are in incognito mode? 7 A. No. 8 Q. And would that be a good way 9 to identify incognito users? 10 A. No. 11 Q. And why is that? 12 A. Because there are cases that 13 will lead to false positives; that is, 14 where you see an empty X-Client-Data 15 header and you assume it's incognito but 16 not and false negatives where the reverse 17 is also true. There are processes that 18 can result in empty client -- empty 19 X-Client-Data headers and to take an 20 empty client -- X-Client-Data header and 21 populate values. 22 Q. Can you give us a couple of 23 examples? 24 A. Sure. For the first case</p>	<p style="text-align: right;">Page 375</p> <p>1 where there are instances where the 2 X-Client-Data header is empty and it's 3 not in incognito browsing, there -- there 4 are quite a few different ways that that 5 can happen. One is if it's a new browser 6 instance, no X-client header is present 7 in any call out from the browser. 8 The second is if you haven't 9 used your browser for 30 days or more, 10 the X-client header data is considered to 11 be stale and just purged and no 12 X-Client-Data header is passed. 13 Another case is if the 14 variation IDs that are carried in the 15 X-Client-Data header, if too many are 16 returned to Chrome to prevent the 17 requests coming from Chrome from being 18 too large, they just delete them all and 19 so you'd see no X-Client-Data header. 20 Yet another permutation is 21 the presence of a firewall can also 22 prevent Chrome, the browser, from getting 23 the variation IDs that are used to 24 populate the X-Client-Data header, and</p>
<p style="text-align: right;">Page 376</p> <p>1 this is because the variation IDs are 2 basically instructions as to what new 3 features are enabled in the browser, and 4 so Chrome, after it starts out, will make 5 an asynchronous call to retrieve these 6 data from the server, and if that server 7 endpoint is blocked by a firewall, no 8 X-Client-Data header is provided, none of 9 the variation IDs. So that's another 10 case where you can have an empty 11 X-Client-Data header. 12 Q. Thank you. That's very 13 helpful. 14 Mr. Berntson, do -- do you 15 understand that you have been designated 16 by Google to testify on topics, with the 17 exception of Topic No. 5 to which Google 18 objected to producing a witness, Topics 1 19 through 4 and 6 through 12? You 20 understand that you've been designated to 21 testify on those topics? 22 A. Yes, I do. 23 Q. On behalf of Google? 24 A. Yes, I do.</p>	<p style="text-align: right;">Page 377</p> <p>1 Q. And -- and did you -- did 2 you indeed prepare to testify on all of 3 those topics? 4 A. I did. 5 Q. How much time do you think 6 you spent preparing to testify on those 7 topics? 8 A. At least 25 hours. 9 Q. And did you conduct 10 interviews with relevant subject matter 11 experts in order to educate yourself on 12 the topics for which you've been 13 designated? 14 A. I did. I interviewed eight 15 different people. 16 Q. Okay. And -- and did you 17 review documents in order to educate 18 yourself on the topics for which you've 19 been designated? 20 A. Yes, and those have been 21 entered as Exhibits 12 and 13. 22 Q. Okay. And that's -- that's 23 a -- a binder of 61 documents by my 24 count; is that right?</p>

<p style="text-align: right;">Page 378</p> <p>1 A. That is correct, 61. 2 Q. And -- and did you review 3 all of those documents -- 4 A. I did. 5 Q. -- as part of your 6 preparation? 7 A. I did. 8 Q. Thank you. 9 MR. BROOME: Unless Mr. Mao 10 has any further questions, I have 11 no further questions. 12 - - - 13 EXAMINATION 14 - - - 15 BY MR. MAO: 16 Q. Hi, Mr. Berntson, I have 17 some questions. 18 Regarding the X-Client-Data 19 header, you provided four instances in 20 which X-Client-Data header would not be 21 present. Can you think of any other 22 instances in which they would not be 23 present other than the four in which you 24 stated?</p>	<p style="text-align: right;">Page 379</p> <p>1 A. Chrome does not send the 2 X-Client-Data header when it is in 3 incognito mode. 4 Q. Okay. That -- that's super 5 helpful. 6 So let me cover the first 7 three. You said a new browser instance, 8 it would not send the X-Client-Data 9 header. How long does that last? 10 A. Until the call that Chrome 11 makes to retrieve the -- the variation 12 IDs is successful, so it's going to 13 depend on the network connection, and as 14 I noted, whether or not there is a 15 firewall in place. 16 Q. Right. But for the -- 17 solely for the new browser instance, 18 that's almost near instantaneous in terms 19 of the browsing session, right? After 20 the first call is made, X-Client-Data 21 header is assigned for that group, and 22 then thereafter it continues to transmit 23 that in normal mode is and not present in 24 the other modes?</p>
<p style="text-align: right;">Page 380</p> <p>1 MR. BROOME: Object to the 2 form. 3 BY MR. MAO: 4 Q. Sorry, in the incognito 5 mode; is that correct? 6 MR. BROOME: Object to the 7 form. 8 THE WITNESS: Can you 9 specify what you mean by "near 10 instantaneous"? 11 BY MR. MAO: 12 Q. How long does it take in 13 your experience? 14 A. If it's a low -- slow 15 network connection it can easily take a 16 minute or two. 17 Q. Okay. But beyond that, are 18 you aware of how long it can persist 19 beyond that without having an X-Client- 20 Data header? 21 MR. BROOME: Object to the 22 form. 23 THE WITNESS: How long -- 24 you're asking how long --</p>	<p style="text-align: right;">Page 381</p> <p>1 BY MR. MAO: 2 Q. Basically with a slow 3 connection -- with a slow connection, it 4 may take a minute or two before they 5 actually get an X-Client-Data header 6 assigned, but after that, it would have 7 an X-Client-Data assigned after the new 8 install; isn't that correct, after a 9 minute? 10 A. Except for the other cases 11 that I identified. 12 Q. Okay. All right. So next 13 case. Still browser for 30 days or more. 14 That's subject to the same caveat, right, 15 if it's a slow browser for 30 days or 16 more, but after the initial request to 17 the Google server, the Google server 18 would then basically assign X-Client-Data 19 header, and with a stale connection that 20 would not take longer than a minute; 21 isn't that correct? 22 A. I would expect to see 23 similarly latency to the first case. 24 Q. Okay. All right. Last</p>

<p style="text-align: right;">Page 382</p> <p>1 one -- I'm sorry, third one. You're 2 talking about when there are too many 3 variations of the X-Client-Data header, 4 all of that will be purged. That's on 5 the server level, that's not on the 6 browser level in terms of when it's 7 transmitted; isn't that true, sir? 8 MR. BROOME: Object to the 9 form. 10 THE WITNESS: The variation 11 I -- the variation IDs are set on 12 the server and returned to the 13 client, and the client makes a 14 determination as to whether or not 15 they have too many. 16 So it's client-side logic, 17 processing data retrieved from the 18 server. 19 BY MR. MAO: 20 Q. Ah, okay. So in how -- in 21 how often do you see there being too many 22 variations of the X-Client-Data header 23 resulting in the browser purging the 24 X-Client-Data header?</p>	<p style="text-align: right;">Page 383</p> <p>1 A. I don't have an answer to 2 that question. 3 Q. Sorry -- 4 A. I don't know how often that 5 happens. 6 Q. You spent hours preparing 7 for this topic as Mr. Broome has 8 established; isn't that correct? 9 MR. BROOME: Object to the 10 form. 11 BY MR. MAO: 12 Q. You oversee Google Ads; 13 isn't that correct? 14 A. No. 15 Q. Sorry. You oversee Google 16 Ad Manager, isn't that correct? 17 A. No. 18 Q. Okay. You are the designee 19 for Google with regard to this topic 20 insofar as it relates to any of the 21 topics properly noticed today. My 22 question to you is: How often, because 23 your answers are going to be binding on 24 Google, how often do you see variations</p>
<p style="text-align: right;">Page 384</p> <p>1 ID of X-Client-Data header being too 2 numerous such that it is actually purged 3 by the browser? 4 MR. BROOME: Objection. He 5 just answered that he doesn't 6 know. 7 BY MR. MAO: 8 Q. Is that theoretical or is 9 that actual is my question. Have you 10 actually seen it? 11 MR. BROOME: That's a 12 different question. 13 THE WITNESS: If this code 14 is executed client side, there is 15 no X-Client-Data header passed, 16 which means it's going to look 17 exactly like the other cases that 18 we just identified because there's 19 no X-Client-Data. 20 BY MR. MAO: 21 Q. In all your time at Google, 22 how often have you actually seen this? 23 A. It's not something that's 24 observable from a server perspective.</p>	<p style="text-align: right;">Page 385</p> <p>1 Q. How often have you actually 2 seen this flagged as a problem with the 3 X-Client-Data header? 4 A. I have not seen this flagged 5 as a problem. 6 Q. Ever, right, in your career 7 at Google? 8 MR. BROOME: Object to the 9 form. Mark, let him finish before 10 you start. Mark, let him finish. 11 Let him finish. I know you're 12 trying to do a nice cross, but 13 just let him finish his answers. 14 BY MR. MAO: 15 Q. Have you ever seen that in 16 your career at Google, this problem? 17 A. As I noted, this is not 18 observable from a server perspective 19 because it's client-side code that makes 20 the call and purges the variation IDs 21 that are sent to the X-Client-Data 22 header. 23 Q. You're saying the 24 variations -- you're saying the</p>

<p style="text-align: right;">Page 386</p> <p>1 variations as in there is more total 2 number of variations out on the field 3 than the actual string can actually hold, 4 right? The string is too small to hold 5 the total number of variations, and 6 therefore, does not know what to do with 7 it and it purges it, is that what you 8 mean? 9 A. That is not what I said. 10 Q. Okay. So explain to me how 11 this third case scenario actually 12 happens. 13 A. If Chrome sends too many 14 variations IDs to -- if the Chrome server 15 sends too many variation IDs to the 16 Chrome browser, the Chrome browser has 17 the ability of looking at that and 18 saying, this is going to increase the 19 payload size more than is good and could 20 increase latency for the amount of data 21 that I need to send over the server, for 22 example, over a slow connection and it 23 purges that data. So it's client-side 24 logic that makes that determination.</p>	<p style="text-align: right;">Page 387</p> <p>1 Q. Okay. And again, you have 2 not actually seen that theoretical 3 problem appear in practice; isn't that 4 correct? 5 MR. BROOME: Object to the 6 form. 7 THE WITNESS: No, but I have 8 seen -- I have seen another 9 problem that goes the other 10 direction where Chrome will send 11 an empty X-Client-Data header and 12 our GFE will insert values. So 13 what we see within GWS is an 14 X-Client-Data header that was 15 empty when it leaves Chrome but 16 then is populated with values in 17 the GFE. 18 BY MR. MAO: 19 Q. Right. But in terms of the 20 absence of the X-Client-Data header as 21 being something that's the result of 22 there being too many variations or too 23 numerous, that's not actually something 24 which have seen; isn't that correct?</p>
<p style="text-align: right;">Page 388</p> <p>1 MR. BROOME: Objection. 2 THE WITNESS: I already told 3 you -- 4 MR. BROOME: Objection to 5 form. 6 THE WITNESS: -- it's not 7 observable from the server side. 8 BY MR. MAO: 9 Q. Right. But you have not 10 even heard of that as being a problem in 11 actuality, right? 12 A. I'm not sure how to answer 13 the question. I am not aware of any bugs 14 that are currently open that are 15 describing this as a problem. Whether 16 it's actually a problem or not is 17 different than whether or not it's 18 happening. 19 Q. Okay. 20 A. The -- the number of 21 occurrences -- 22 Q. Sorry. I have one other 23 question. 24 A. -- of cases where -- that's</p>	<p style="text-align: right;">Page 389</p> <p>1 great, let me finish. 2 Q. Sure. 3 A. The number of occurrences 4 where variation IDs are inserted by the 5 GFE turns out to be relatively high, and 6 this is going to result in a case where 7 if there was an empty X-Client-Data 8 header, for any of the reasons that it 9 could be empty, it ends up not being 10 empty when it's seen by GWS. 11 So there are cases both 12 where you'll see an empty client data 13 header that is not related to whether or 14 not Chrome is in incognito mode, and 15 there are cases where you're going to see 16 an X-Client-Data header that is not empty 17 that could be associated with incognito 18 mode. 19 And so as a signal, Google 20 does not use whether or not the 21 X-Client-Data header is empty or not, as 22 an indication of whether or not incognito 23 mode is enabled in Chrome. 24 Q. With regard to your talking</p>

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1 about [REDACTED] did you actually
2 prepare for the topic of [REDACTED]
3 before you came to testify here today?

4 A. It was a topic that was
5 covered briefly in one of my discussions.

6 Q. Is that topic for Chris Law?
7 Sorry, Chris -- Chris Liao or is that a
8 topic in which you are prepared to
9 discuss in terms of how that is actually
10 formed?

11 MR. BROOME: Objection to
12 form.

13 THE WITNESS: I believe -- I
14 believe I answered the question as
15 it relates to how [REDACTED]
16 works, what IDs are used and the
17 use cases that it supports. I
18 don't know what additional
19 information you're looking for as
20 it relates to [REDACTED]

21 MR. MAO: I have no further
22 follow-up. Again, I reserve my
23 rights.

24 MR. BROOME: Okay. All

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1 right. Well, thank you,
2 everybody. Thank you, Connie.
3 Our condolences. And Adam, Mark,
4 thank you. And see you all next
5 time.

6 THE VIDEOGRAPHER: Let me
7 take us off the record. Hold on.

8 The time is now 7:34 PM, and
9 we are going off the record.

10 (Witness excused.)

11 (Deposition concluded at
12 approximately 7:34 PM.)
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1
2 CERTIFICATE
3

4 I HEREBY CERTIFY that the
5 witness was duly sworn by me and that the
6 within deposition is a true and accurate
7 transcript of the stenographic notes of
8 the testimony given by the witness.

9 It was requested before
10 completion of the deposition that the
11 witness, GLENN BERNTSON, have the
12 opportunity to read and sign the
13 deposition transcript.

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[REDACTED]

Certified Court Reporter
Registered Professional Reporter
Certified LiveNote Reporter
and Notary Public
Dated: June 20, 2021

(The foregoing certification
of this transcript does not apply to any
reproduction of the same by any means,
unless under the direct control and/or
supervision of the certifying reporter.)



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1 INSTRUCTIONS TO WITNESS
2

3 Please read your deposition
4 over carefully and make any necessary
5 corrections. You should state the reason
6 in the appropriate space on the errata
7 sheet for any corrections that are made.

8 After doing so, please sign
9 the errata sheet and date it.

10 You are signing same subject
11 to the changes you have noted on the
12 errata sheet, which will be attached to
13 your deposition.

14 It is imperative that you
15 return the original errata sheet to the
16 deposing attorney within thirty (30) days
17 of receipt of the deposition transcript
18 by you. If you fail to do so, the
19 deposition transcript may be deemed to be
20 accurate and may be used in court.
21
22
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ERRATA SHEET FOR THE TRANSCRIPT OF

Case: Calhoun, et al. v. Google LLC

Deposition Date: June 11, 2021

Deponent: David Monsees

	Pg. and Ln.	Now reads	Should read	Reason
1	27:21;			
2	174:12, 17;			
3	175:1;			
4	178:17;			
5	181:5;			
6	244:4, 15, 19, 21;			
7	253:14;			
8	309:22	STKs	SDKs	transcription error
9	28:11, 15;			
10	37:5;			
11	38:8;			
12	88:6, 10, 15;			
13	97:19;			
14	102:5;			
15	105:8;			
16	117:22, 23;			
17	118:1, 4;			
18	120:5, 14, 18;			
19	131:7, 8;	STK	SDK	transcription error

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cont	Pg. and Ln.	Now reads	Should read	Reason
1	158:4;			
2	172:19, 22;			
3	174:20, 23;			
4	175:6;			
5	176:3, 8, 9, 12, 18, 20,			
6	23;			
7	226:5;			
8	228:5;			
9	245:1, 2, 4, 13;			
10	254:21, 22;			
11	255:3, 8, 13, 15;			
12	256:19;			
13	274:7, 8, 10, 13;			
14	276:13;			
15	277:19;			transcription error
16	310:10	STK	SDK	transcription error
17	549, 11, 12, 14, 18, 19,			
18	23, 24;			
19	55:6, 10, 17, 56:3, 7, 9;			
20	58:3, 9;			
21	59:3, 5, 10, 61:4, 11,			
22	12;			
23	62:2, 8, 11, 13, 16, 17,			transcription error
24	22;			transcription error

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cont	Pg. and Ln.	Now reads	Should read	Reason
1	63:2, 3, 8, 10;			
2	65:24;			
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5	69:2;			
6	71:13, 15;			
7	121:9, 10, 13;			
8	126:5, 15;			
9	243:4, 7;			
10	294:3, 4;			
11	298:20, 23;			
12	299:2, 4, 5;			
13	300:23;			
14	331:1, 3			transcription error
15	88:6	A, the	The	transcription error
16	107:10	00078278	00078378	transcription error
17	109:12	up-to-date	out-of-date	misspoke
18	157:19	If Biscotti	A Biscotti	transcription error
19	166:11;			
20	202:23;	conversation		
21	203:3, 15	s	conversions	transcription error
22	204:6	conversation	conversion	transcription error

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DocuSigned by:

Glen Benton

AADA263B18144EF...
Signature of Deponent

7/27/2021

Date

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1
2 ACKNOWLEDGMENT OF DEPONENT
3
4 I, Glenn Berntson, do
5 hereby certify that I have read the
6 foregoing pages, 1 - 396, and that the
7 same is a correct transcription of the
8 answers given by me to the questions
9 therein propounded, except for the
10 corrections or changes in form or
11 substance, if any, noted in the enclosed
12 Errata Sheet.
13 DocuSigned by:
14 Glenn Berntson 7/27/2021
15 AADA263B18144EF...
16 GLENN BERNTSON DATE
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1 LAWYER'S NOTES
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